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Matthew Gregory, Michael Thalman,  
and Robert Robinson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JEFF SLADEK,

Plaintiff,

vs.

ROBERSON, et al.,

Defendants.

Case No. 3:19-cv-00764-MMD-CLB

**DEFENDANTS' MOTION FOR  
EXTENSION OF TIME TO SUBMIT  
DISPOSITIVE MOTION  
(First Request)**

Defendants Matthew Gregory, Michael Thalman, and Robert Robinson (collectively the "NDOC Defendants"), by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and David A. Bailey, Deputy Attorney General, hereby request a 21-day extension of time, to March 30, 2022, to file a dispositive motion. The present motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), LR 1A 6-1, LR 26-3, the following Memorandum of Points and Authorities, and all papers and pleadings on file in this case.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION AND PROCEDURAL HISTORY**

This is a pro se prisoner civil rights action brought by Plaintiff Jeff Sladek, concerning events that allegedly took place at the Warm Springs Correctional Center, asserting claims arising under 42 U.S.C. § 1983.

On August 11, 2021, this Court entered an Amended Scheduling Order. ECF No. 45. The discovery cut off was February 7, 2022, and the dispositive motions are to be filed

by March 9, 2022. *Id.* at 1-2. Discovery is complete. Defendants now file this extension of time requesting this Court grant an additional 21 days to file their dispositive motion.

## II. ARGUMENT

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to “achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991). “Such power is indispensable to the court’s ability to enforce its orders, manage its docket, and regulate insubordinate . . . conduct.” *See Wallace v. U.S.A.A. Life General Agency, Inc.*, 862 F. Supp. 2d 1062, 1068 (D. Nev. Sept. 30, 2010) (*citing Mazzeo v. Gibbons*, No. 2:08–cv01387–RLH–PAL, 2010 WL 3910072, at \*2 (D.Nev.2010)).

LR IA 6-1 discusses requests for continuances. The rule states:

(a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted. (Examples: “This is the first stipulation for extension of time to file motions.” “This is the third motion to extend time to take discovery.”)

This is the first request and is requested for good cause. *See* LR 26-3. Counsel for the NDOC Defendants requires additional time to properly present the arguments to challenge Plaintiff’s Complaint. The NDOC Defendants’ request will not hinder nor prejudice Plaintiff’s prosecution of his case. The requested 21-day extension of time is needed to allow Counsel to finalize an appropriate dispositive motion. The NDOC Defendants assert that the requisite good cause is present to warrant the requested extension of time, and that this request is made in good faith and not for the purpose of delay.

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1 **III. CONCLUSION**

2 The NDOC Defendants request this Court extend the deadline for dispositive motions  
3 in this matter. The NDOC Defendants assert that the requisite good cause is present to  
4 warrant the requested extension of time. The request is timely. Therefore, the NDOC  
5 Defendants request additional time, up until **March 30, 2022**, to file a dispositive motion in  
6 this matter.

7 DATED this 9th day of March 2022.

8 AARON D. FORD  
9 Attorney General

10 By: /s/ David A. Bailey  
11 DAVID A. BAILEY, Bar No. 13661  
Deputy Attorney General

12 *Attorneys for Defendants*  
13 *Renee Baker, Scott Davis, and*  
*Harold Wickham*

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15 **IT IS SO ORDERED.**

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17 **U.S. MAGISTRATE JUDGE**

18 **DATED:** March 10, 2022  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 9th day of March 2022, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO SUBMIT DISPOSITIVE MOTION (First Request)**, by U.S. District Court CM/ECF system.

For those parties not registered with the Court's CM/ECF system, true and correct copies were sent via U.S. Mail to the following:

Jeff Sladek  
220 Cheney Street, #18  
Reno, NV 89502

/s/ Karen Easton  
An employee of the  
Office of the Attorney General